

Approved: Andrew DeFilippis  
ANDREW DeFILIPPIS  
Assistant United States Attorney

ORIGINAL

Before: HONORABLE P. KEVIN CASTEL  
United States District Judge  
Southern District of New York

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: UNITED STATES OF AMERICA :  
: - v. - :  
: JESSICA ROBBINS, :  
: Defendant. :  
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SEALED COMPLAINT

Violation of  
18 U.S.C. § 2261A(2)

COUNTY OF OFFENSE:  
NEW YORK



SOUTHERN DISTRICT OF NEW YORK, ss.:

BRADFORD PRICE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, and charges as follows:

COUNT ONE

1. From at least in or about February 2012 through at least in or about June 2014, in the Southern District of New York and elsewhere, JESSICA ROBBINS, the defendant, willfully, knowingly, and with the intent to injure, harass, and intimidate, used the mail, an interactive computer service and electronic communication service, an electronic communications system of interstate commerce, and a facility of interstate and foreign commerce, to engage in a course of conduct that placed a person in reasonable fear of death or serious bodily injury to the person, the immediate family member of such person, and the spouse of such person, and that caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to a person, the immediate family member of the person and the spouse of such person, to wit, ROBBINS posted repeated harassing messages over the Internet that caused substantial emotional distress to a well-known musician, his wife, and his immediate family.

(Title 18, United States Code, Section 2261A(2).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and I have been involved in the investigation of the above-described offense. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including, among other things, my review of pertinent documents, and my communications with law enforcement officers and administrative agencies. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### Background

3. I have communicated with a well-known musician ("Victim-1") and his spouse ("Victim-2"), who have told me, in substance and in part, the following:

a. Victim-1 and Victim-2 are married and resided in New York, New York and Miami, Florida with their two children until in or about early 2014.

b. In or about 2008 or 2009, Victim-1 had a public signing event for his fans at which JESSICA ROBBINS, the defendant, was a member of the "Street Team" that assisted in running Victim-1's event.

c. At the conclusion of the signing event, Victim-1 was informed by a member of his security team that an individual wanted to meet him, whereupon Victim-1 observed ROBBINS running towards him and yelling his name. As ROBBINS approached Victim-1, she asked, in sum and substance, whether the manuscripts had been helpful. Victim-1 had not met ROBBINS previously or received manuscripts from ROBBINS.

d. As ROBBINS approached Victim-1, Victim-1 became concerned for his safety due to ROBBINS' agitated and unstable demeanor and appearance.

e. Shortly thereafter, Victim-2 entered the area where Victim-1 was standing, whereupon ROBBINS began yelling, in sum and substance, "[Victim-2] knows!"

f. Sometime after this incident, Victim-1 and Victim-2 learned that ROBBINS had posted videos on the Internet in which ROBBINS discussed the aforementioned incident and stated that Victim-1 had plagiarized writings that ROBBINS had sent to Victim-1.

g. Following the incident, Victim-1 and Victim-2 also became aware of other Internet postings that Victim-1 and Victim-2 believed were authored by ROBBINS.

h. Among the Internet postings referenced above were messages containing false allegations that Victim-2 was abusing Victim-2's child; that ROBBINS, rather than Victim-2, was the mother of the child; and that Victim-2 had a cocaine addiction.

i. In or about October 2013, Victim-1 and Victim-2 learned of an Internet posting, which they believed to have been authored by ROBBINS due to similarities in content to that of other posts authored by ROBBINS. In the posting, ROBBINS stated, in substance and in part, that she drove seven hours to talk to Victim-1 but was unable to enter the elevator in his residence because she did not have an elevator key. Victim-1 and Victim-2 became concerned for their safety because, among other reasons, their residence in Miami has an elevator that requires a key, and because Miami is approximately a seven-hour drive from Tampa, Florida, where ROBBINS is believed to reside.<sup>1</sup>

j. In or about January 2014, Victim-1 and Victim-2 became aware of additional Internet postings from an individual whom they believed to be ROBBINS based in similarities in content and subject matter to that of other posts authored by ROBBINS. In the postings, ROBBINS stated, in substance and in part, that she had reported Victim-2 for child abuse; that Victim-2 was under investigation for child abuse in New York; and that ROBBINS had spoken to a detective regarding the investigation. Moreover, in or about early 2014, Victim-1 and Victim-2 were contacted by the New York State Office of Children and Family Services ("OCFS") with regard to allegations of child abuse. From my review of toll records obtained from the telephone service provider for the OCFS, I have learned that on or about December 11, 2013, the New York State Child Protective

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<sup>1</sup> See Paragraphs 5-6, *infra*.

Services hotline received a call from a phone number that I know from a search of commercial databases is registered to ROBBINS.

k. As a result of the foregoing incidents, Victim-1 and Victim-2 have each suffered emotional trauma, inability to focus on work activities, sleep loss, and anxiety. Victim-1 and Victim-2 also removed their children from school in New York for fear that ROBBINS might travel to New York in an attempt to harm them.

4. From my communications with an individual who works for Victim-1 as a website administrator ("Individual-1"), I have learned the following:

a. Since in or about early 2012, Individual-1 has monitored and preserved screenshots of hundreds of hostile and harassing Internet postings regarding Victim-1 and Victim-2 that Individual-1 believes originated from the JESSICA ROBBINS, the defendant. These messages have appeared on various websites and social media platforms, including, among others, Twitter and AlternativeNation.net.

b. The postings on Twitter have appeared under at least 37 different "usernames."

c. According to Individual-1, ROBBINS often posts more than one hundred messages per day concerning Victim-1 and/or Victim-2 using different usernames.

d. Individual-1 believes that the postings have a common source based on, among other things, their recurring language, themes, and their aggressive and hostile content. Moreover, Individual-1 believes that the messages were authored by ROBBINS because, among other reasons:

i. Certain of the postings on Twitter bear pictures depicting ROBBINS.

ii. Certain of the postings made on the website AlternativeNation.net were traced by the website's administrator to an IP address ("IP Address-1"), which, according to publicly available registry information, is registered to an internet connection located in Tampa, Florida, the city in which ROBBINS resides.

5. I have obtained records from the Internet Service Provider for IP Address-1. Those records indicate that IP



Address-1 is registered to a subscriber who is identified in commercial databases as the mother of JESSICA ROBBINS, the defendant (the "Subscriber"). Those records list an address in Tampa, Florida as the Subscriber's home address ("Address-1").

6. From my discussions with another FBI agent ("Agent-1"), I learned that in or about April 2014, Agent-1 spoke with an individual who resides in the neighborhood of Address-1 ("Individual-1"). Individual-1 stated to Agent-1 that JESSICA ROBBINS, the defendant, lives at Address-1. Individual-1 also identified a car that was parked in the vicinity of Address-1 as belonging to ROBBINS ("Vehicle-1").

7. I have reviewed screenshots provided to me by Individual-1 of at least 130 "tweets" posted under various usernames between in or about September 2013 and in or about January 2014.

a. Among the screenshots I have reviewed are those of tweets posted under the username "Goldfish@goldfish7772." Based on records obtained from Twitter, I learned that the username "Goldfish@goldfish7772" was created using an internet connection assigned to IP Address-1, which, as noted above, is registered to the last known residence of JESSICA ROBBINS, the defendant. From my review of the screenshots provided by Individual-1, I learned that the following tweets were posted by "Goldfish@goldfish772" in or about December 2013:

@[Victim-2] you are an evil, empty, hateful & sadistic piece of flaming shit to use those children like chess pieces. Roadie fucking whore.  
12:12 AM - 12 Dec 13

@[Victim-2] go snort more coke & fuck kevin again & steal more money u lying crack whore child abusing monster excuse of a cunt devil rat  
11:54 PM - 11 Dec 13

@[Victim-1] yeah "angels" [Victim-2] uses to tie dental floss around your balls with & imprison you by the kids are the bars to your prison.  
11:50 PM - 11 Dec 13

@trudy111 why don't you just hold the child down while they beat & abuse him, you sure seem like the blindly fame exalting type  
[time unknown] - 12 December 13

@trudy111 I bet u didn't know that icky woman beats this shit out of that little boy and leaves bruises on him & made him eat dog food  
[time unknown] 12 Dec 13

@trudy111 no, what's crazy are fame worshipping peons like u who enable bad child abusers to commit grand larceny with gratuitous ass kissing  
[time unknown] 12 Dec 13

b. I have also reviewed screenshots of tweets posted under the username "Jessica in Leather@Jessicanleather." The user profile for "Jessica in Leather@Jessicanleather" contains a picture of JESSICA ROBBINS, the defendant. Based on records obtained from Twitter, I learned that the username "Jessica in Leather@Jessicanleather" was created using an internet connection assigned to IP Address-1. From my review of the screenshots provided by Individual-1, I learned that the following tweets were posted by "Jessica in Leather@JessicanLeather" in or about December 2013:

@[Victim-1] [Victim-1] told me she'd "put his head in the dog food & said, "My mother is the devil." & wanted to google a pic of the devil.  
12:47 PM - 11 Dec 13

I have overwhelming thoughts of death and feel death is the only way to stop a married man from feeding on my soul the rest of my life.  
8:53 PM - 5 Dec 13

c. I have also reviewed screenshots of tweets posted under the username "YodaWalker@WalkerYoda." Based on records obtained from Twitter, I learned that the username "YodaWalker@WalkerYoda" was created using an internet connection assigned to IP Address-1. From my review of the screenshots provided by Individual-1, I learned that the following tweets were posted by "YodaWalker@WalkerYoda" in or about December 2013:

@[Victim-1] if that's your material hell spawn "family" u stand for, u better be prepared to go down with them & have the feds up your ass  
2:53 PM - 11 Dec 13

@[Victim-1] because you have 2 days to leave & cut ties before I report your sorry ass to the IRS for tax evasion. Merry Christmas.

d. I have also reviewed screenshots of tweets posted under the username "Confessional Booth@SirenSanctuary." The user profile for "Confessional Booth@SirenSanctuary" contains a picture of JESSICA ROBBINS, the defendant. From my review of the screenshots provided by Individual-1, I learned that the following tweets were posted by "Confessional Booth@SirenSanctuary" in or about September 2013:


I forgive her, but I'm done playing these games with her, she is not going to be able to hurt him ever again by the time I'm done with her.  
2:02 PM - 25 Sep 13

I passed by life test bc I forgave her, but within hours God said "U forgave her, but I AM vanquishing her so she can't hurt anyone else"  
[exact time unknown] - 25 Sep 13

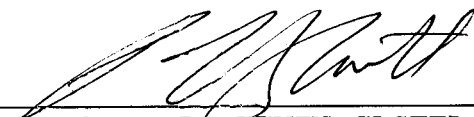
She should be locked up in a cell next to Lennon's killer-do not have contact w/ people around her wake up & smell the attempted murder  
[exact time unknown] - 25 Sep 13

SHE LEFT YOU WITH .40 CENTS OF YOUR OWN MONEY - STOP COMMUNICATING WITH HER OR ANYONE AROUND HER!!  
[exact time unknown] - 25 Sep 13

WHEREFORE, the deponent respectfully requests that a warrant be issued for the arrest of JESSICA ROBBINS, the defendant, and that she be arrested and imprisoned or bailed, as the case may be.

  
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BRADFORD PRICE  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
24th day of July 2014

  
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HONORABLE P. KEVIN CASTEL  
United States District Judge  
Southern District of New York